

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

FIRST PIONEER FARM CREDIT, ACA)	
)	
Plaintiff,)	
v.)	CIVIL ACTION
)	NO. 04-12508 GAO
FIRST PIONEER CREDIT UNION,)	
)	
Defendant.)	

JOINT MOTION TO AMEND THE SCHEDULING ORDER

The parties, First Pioneer Farm Credit, ACA and First Pioneer Credit Union, by and through their respective counsel, jointly move to amend the scheduling order with respect to as yet incomplete pretrial deadlines,¹ in order to accommodate and complete their ongoing discovery.

Proposed Pretrial and Trial Schedule

April 8, 2005	If any party believes it is entitled to summary judgment, any motions for summary judgment shall be submitted.
April 15, 2005	All fact and expert discovery shall be completed.
April 22, 2005	The parties shall exchange a list of proposed trial exhibits and trial witnesses.
	Any opposition to a motion for summary judgment and any supporting materials shall be filed.
April 25, 2005	A pre-trial conference shall commence at 2:00 p.m. The parties shall file a list of proposed trial exhibits and trial witnesses with the Court.

¹ The parties are not seeking to change the deadlines for the exchange of automatic disclosures or the disclosure of expert witnesses.


April 28, 2005	Any reply to an opposition to a motion for summary judgment and any supporting materials shall be filed.
May 2, 2005	Any surreply to a reply to an opposition to a motion for summary judgment and any supporting materials shall be filed.
May 4, 2005	A hearing/trial on the claim for permanent injunction shall commence at 9:00 a.m.

Dated: March 25, 2005

Respectfully submitted,

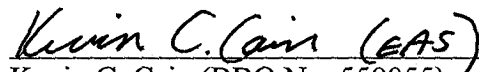
FIRST PIONEER FARM CREDIT, ACA,

By its attorneys,


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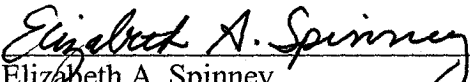
FIRST PIONEER CREDIT UNION

By its attorneys,


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the above document was served upon all counsel of record by facsimile this 25th day of March 2005.


Elizabeth A. Spinney